

# **Exhibit E**



Holly Cole <holly@holcombward.com>

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## Continuation of FOL 30b6 Deposition

1 message

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Holly Cole <holly@holcombward.com>

Mon, Oct 14, 2024 at 1:26 PM

To: "Daniel J. Vedra" <dan@vedralaw.com>, Paul Rachmuth <paul@paresq.com>, Bryan Ward <bryan.ward@holcombward.com>, "Mr. Aaron Wright" <aaron@holcombward.com>

See the attached Notice of Deposition for the continuation of FOL's 30b6 deposition on October 30, 2024 at 11:00AM eastern.

Holly Cole

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Floyd's v. ACLP\_ Defendants' Continuation of 30b6 Notice of Deposition to FOL.pdf

120K

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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FLOYD’S OF LEADVILLE, INC.,  
N/K/A VALUED, INC.,

Plaintiff,

vs.

Case No.: 1:22-cv-03318-DEH

ALEXANDER CAPITAL, L.P., NESA  
MANAGEMENT, LLC, JOSEPH ANTHONY  
AMATO, ROCCO GERARD GUIDICIPIETRO,  
JONATHAN GAZDAK, RONALD BARRIE  
CLAPHAM, MARK LEONARD, PROVISION  
HOLDING, INC., TIMOTHY KELLY, and  
THREE DDD, LLC,

Defendants.  
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**NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(B)(6)**

TO: Floyd’s of Leadville, Inc., n/k/a Valued, Inc.  
c/o Daniel J. Vedra  
Vedra Law, LLC  
1444 Blake Street  
Denver, CO 80202  
dan@vedralaw.com

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 30(b)(6), Defendants Alexander Capital, LP, NESA Management, LLC, Joseph Amato, Rocco Guidicipietro, and Jonathan Gazdak, will take the continued deposition upon oral examination of Plaintiff Floyd’s of Leadville, Inc., n/k/a Valued, Inc. on October 30, 2024 at 11:00 a.m. EDT on the topics previously identified.

The deposition will take place by internet-based remote electronic means and shall continue day to day until completed. The deposition will be taken virtually before a certified shorthand reporter. The deposition will be recorded by audio, audio-visual means, and stenographic means.

Virtual appearance information to follow under separate cover.

Respectfully submitted this 14th day of June 2024.

/s/ Bryan Ward

Bryan Ward (*Pro Hac Vice*)

Holly Cole (*Pro Hac Vice*)

Aaron Wright (*Pro Hac Vice*)

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*Counsel for Defendants Alexander Capital LP,  
Joseph Amato, Rocco Guidici Pietro, Jonathan  
Gazdak, and NES Management, LLC*